

# EXHIBIT 6

Case No. 4:13-CV-00086-ODS

was employed in private law practice and I am currently an attorney in good standing in the State of New Jersey and the Commonwealth of Pennsylvania. My C.V. is attached as Exhibit "A."

3. By way of background, Angeion Group is a class action notice and claims administration company formed by a team of executives with more than 60 combined years of experience implementing claims administration and notice solutions for class action settlements and judgments. With executives that have had tenures at five other nationally recognized claims administration companies, collectively, the management team at Angeion has overseen more than 2,000 class action settlements, processed over 250 million claims, and distributed over \$10 billion to class members.

4. This declaration will describe the notice program that my staff and I propose for this case, including the considerations that informed the development of the plan and why we believe it will be effective.

5. SUMMARY OF NOTICE PLAN

The reach of the notice program is specifically designed to meet due process requirements and is consistent with other effective court-approved notice programs. Specifically, the notice program will deliver a 73.0% reach with an average frequency of 2.91 times each, via publication in well-known consumer magazines and use of internet banner ads as more fully described within. The 73.0% reach figure does not include notice delivered consequent to the Facebook ads, press release, direct mail campaign and/or informational website, which will also be used in this matter, because those items are not capable of precise reach calculations. The aforementioned items will nonetheless aid in informing the class of their rights and options relative to the settlement above and beyond the use of consumer magazines and internet banner ads.

## 6. CLASS DEFINITION AND TARGET

This matter contemplates two nationwide settlement classes, encompassing economic-loss claims involving: (1) all Model 700, 721, 722, 725, Seven, Sportsman 78, 600, 660, 673, XP-100, 710, 715, and 770 firearms manufactured by Remington or SGPI that contain trigger mechanisms that utilize a trigger connector; and (2) Model 700 and Seven bolt-action rifles containing X-Mark Pro trigger mechanisms that are subject to the April 2014 voluntary recall;

7. In developing the notice program, I was advised by counsel that that there were approximately 6,650,000 firearms sold under the models referenced in Class A, although not all of them may still be in circulation. Likewise, I was advised that there are approximately 1.2 million Class B rifles. Moreover, I was advised that there are less than 10,000 US Postal Address or e-mail addresses available via the defendant's records.

8. Demographic and media usage data are not readily available for owners of the particular Remington Models at issue in this litigation. Consequently, to verify the notice program's effectiveness, our media team analyzed syndicated research data using the GfK MRI 2013 Doublebase survey<sup>1</sup>. We used "rifle owners," as the best representation for the class. We chose this definition because this comprehensive, over inclusive target group, best represents the Class.

9. Understanding the socio-economic characteristics, interests and practices of a target group aids in the proper selection of media to reach that target. Here, the data indicates a heavy male skew, with men accounting for 73.1% of the total audience. The majority are

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<sup>1</sup> GfK MRI is a leading supplier of publication readership and product usage data for the communications industry. GfK MRI offers complete demographic, lifestyle, product usage and exposure to all forms of advertising media. As the leading U.S. source of multimedia audience research, GfK MRI provides information to magazines, television and radio networks and stations, internet sites, other media, leading national advertisers, and over 450 advertising agencies – including 90 of the top 100 in the U.S. MRI's national syndicated data is widely used by companies as the basis for the majority of the media and marketing plans that are written for advertised brands in the U.S.

married (67%) and between the ages of 35 and 64, with an average age of 48. The average household income is \$86,550 (compared to the national average of \$74,900). Eighty percent own a home, with an average home value of \$221,996.

10. In order to identify the best print vehicles to deliver messaging to the target audience, over 200 measured titles were analyzed in GfK MRI (2013 Doublebase). While coverage, or reach, was the most critical factor in title selection, other considerations were taken into account, including audience composition, pricing efficiencies and editorial relevancy.

#### 11. PUBLICATION NOTICE

Based on the GfK MRI data analysis, the parties will place a half page notice, substantially in the form attached as Ex. C to the Parties' Settlement Agreement, in each of the following titles:

Publication	Circulation
USA Weekend	18,391,341
Athlon Sports	9,263,338
Field & Stream	1,254,256
Guns & Ammo	414,670
North American Hunter	558,481
American Rifleman	2,238,735
American Hunter	899,253

#### 12. INTERNET BANNER AND SOCIAL MEDIA NOTICE

In addition to the consumer magazine publications noted above, we recommend utilizing digital and social media as supplementary media to aid in delivering notice to the class members. In forming this recommendation, we utilized the online research tool, comScore. While this syndicated tool is able to profile online users across a variety of demographic, psychographic and behavioral data points, it does not currently profile rifle ownership. As such, a demographic

definition was established based on “rifle owners” as reported in GfK MRI. This definition was determined as M35-64 with a HHI \$75K+. This demographic profile was used to establish the top online networks for this initiative and will also aid in the design and implementation of a Facebook Advertising Campaign designed to supplement to the consumer magazine and digital banner ad campaign.

### 13. INTERNET BANNER NOTICE

Advertising networks are recommended because they provide the largest reach of any publisher category, allow for multiple targeting layers to ensure message exposure among the most appropriate users, and help maintain efficiencies. While many publishers were considered, the recommended partners were ultimately selected based on ability to provide the most aggressive pricing with multiple targeting layers in order to ensure vast coverage of the target audience.

14. The recommended networks include Xaxis, Yahoo! and Google Content Network. A 4-week campaign across all publishers utilizing standard IAB sizes (160x600, 300x250, 728x90) will be targeted contextually, behaviorally and by keyword and will deliver in excess of 37,000,000 impressions.

### 15. INDIVIDUAL NOTICE

The individual notice effort in this matter will consist of mailing Direct Notices, substantially in the form attached hereto as Exhibit C, by U.S. Mail, proper postage prepaid, to each member of the Settlement Class identified by the Parties through reasonable efforts, including all Settlement Class Members who paid Remington to replace the Walker trigger mechanism in their Model 700 or Model Seven rifles with an X-Mark Pro trigger mechanism, as identified by Remington's records.

16. JOINT PRESS RELEASE

The parties will issue an informational press release to approximately 6,000 press outlets throughout the U.S. There is no guarantee of the number of press outlets that will report the story but a press release often provides a valuable role in class member notification, especially when the settlement concerns a well-known consumer product.

17. RESPONSE MECHANISMS

We will establish a toll-free telephone line to provide settlement-related information to Settlement Class Members. The toll-free telephone number will be included in the published notice, long form notice and direct notice and will be capable of receiving requests for Claim Forms and/or the Long Form Notice as well as providing general information concerning deadlines for opting out of the Settlement or objecting to it, and the dates of the relevant Court proceedings, including the Final Approval Hearing. The toll-free telephone facility and the Settlement Phone Number shall be maintained for twenty (20) months after the Effective Date of the settlement.

18. Likewise, we will establish an informational case website, with an easy to remember domain name, where class members can view relevant court documents, notice documents, the claim form, operative dates and a frequently asked questions page (“the Settlement Website”). The website will be prominently displayed on all notice materials.

19. REACH AND FREQUENCY

The notice program will deliver 73.0% reach with an average frequency of 2.91 times each. The Facebook ads, press release, direct mail campaign and Settlement Website are not capable of precise reach calculations but will nonetheless aid in informing the class of their rights and options relative to the settlement.



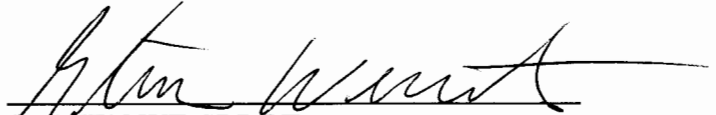
20. The reach of the target audience and the number of exposure opportunities complies with due process and exceeds the Federal Judicial Center's threshold as to reasonableness in notification programs designed to reach unidentified class members. Therefore, it is my opinion that the Notice Program is fully compliant with Rule 23 of the Federal Rules of Civil Procedure.

21. In addition, although not included in the reach percentage above, the social media campaign, informational press release and case website provide information about the Settlement to Settlement Class Members and makes available to Settlement Class Members a copy of the Long Form Notice.

22. CONCLUSION

In my opinion, the notice program meets the expressed requirements of Rule 23 of the Federal Rules of Civil Procedure and will provide members of the Settlement Class the best notice practicable under the circumstances, including individual notice to all members who could be identified through reasonable effort. The notice program provides reach and frequency evidence which courts systematically rely upon in reviewing class action notice programs for adequacy and meets or exceeds the guidelines as set forth in the Federal Judicial Center's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*, which considers 70-95% reach among class members as reasonable.

23. At the conclusion of the Notice Program, we will provide a final report verifying the notice program's adequacy and implementation.

  
STEVEN WEISBROT

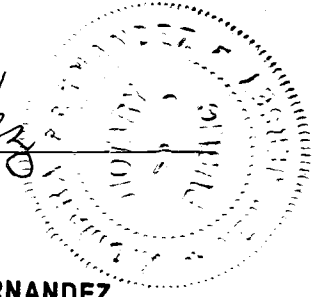
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this  
5th day of December, 2014.



My Commission Expires:

11/28/2017

  
NOTARY PUBLIC



**XIOMARA FERNANDEZ**  
**NOTARY PUBLIC OF NEW JERSEY**  
**I.D. # 2427387**  
**My Commission Expires 11/28/2017**

# Steven Weisbrot, Esquire

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## Summary

Nationally recognized authority on class action notice and settlement administration, with strong expertise in the design and implementation of claims processes, claim form design, legal notification campaigns and the use of digital and social media in class action notice campaigns.

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## Education

**Duke University**

**Continuing Studies**, Durham, NC

*Certificate program in Digital Media and Marketing*

*Expected  
Completion  
January  
2015*

**Rutgers University School of Law**

**Juris Doctor**, Camden, NJ

2004

**Rowan University**

**Bachelors of Arts-Professional Writing/Journalism**, Glassboro, NJ

2001

## Career History & Accomplishments

### Angeion Group,

Executive Vice President, Sales & Strategy

10/13- Present

- Collaborate on the design and implementation of various class action notice campaigns utilizing direct mail, print publication, digital banner advertisements and social media.
- Create and present accredited *Continuing Legal Education* classes to attorneys on class action notice and ascertainability.
- Contribute industry expertise to client engagements by acting as a consultant in class action settlement matters including, offering specific expertise on legal notification, claims rates, claims administration, ascertainability and settlement funds escrow.

### Kurtzman Carson Consultants

Director, Class Action Services

April 2011- 9/13

- Served as a thought leader on trends and developments within the class action community with special emphasis on consumer, securities and employment class action litigation.
- Frequent media contributor, author, commentator and guest-blogger with industry-wide recognition.
- Collaborated with marketing department to design written and online materials apropos of a high-end, soft-sell, business development campaign.
- Lead high-stakes, multimedia pitches to potential clients.

### Attorney in Private Practice

September 2004- April 2011

Lane M. Ferdinand P.A., Jaroslawicz & Jaros, LLC, Nagel Rice, LLP, Luber & Cataldi, LLC, Law Offices of Joseph Marrone

**Exhibit A**

- Advised and advocated for clients in all aspects of commercial, class action and general liability cases from inception up to and including trial, including drafting pleadings and discovery, taking and defending lay and expert witness depositions, preparing witnesses and witness disclosures, arguing dispositive and non-dispositive motions and appeals arising from such motions.

## Speaking Engagements and Accredited CLE Programs

12/2012 **Morgan Lewis & Bockius**- *Ethics of Legal Notification in Class Action Settlements*

08/2013 **DLA Piper**- *The Fundamentals of Settlement Administration*

10/2013 **New Jersey Institute for Continuing Legal Education**-- *Nuts and Bolts of Filing a Class Action*

5/2014 **Angeion Group LLC and Xaxis**, *Class Action Digital and Social Media Symposium, Use of Digital and Social Media in Class Action Settlements*

9/2014 **Duane Morris LLP**, - *Ascertainability and Damages Issues In Food and Cosmetic Mislabeling Class Actions*

9/2014 **Perrin Conferences**- *Ascertainability and Damages Issues In Food and Cosmetic Mislabeling Class Actions*

10/2014 **Terrell Marshall Daudt & Willie, PLLC, and Keller Rohrback LLP**- *Cutting Edge Class Action Notice Programs*

10/2014 **American Bar Association** -2014 *Class Actions National Institute- Big Shoulders and High Standards. Can Plaintiff Scale the Third Circuit's New Ascertainability Wall?"*

## Articles Authored or Co-Authored

A New Approach for Class Action Media Notice Programs	Portfolio Media (Law360)	2014
4 Steps For Smooth Class Action Settlement Administration	Portfolio Media (Law360)	2013
Steven Weisbrot When selecting a class action settlement administrator: Do not Settle for Less!	BNA publications	2012
How to Design Your Notice to Minimize Professional Objectors	classactionlawsuitdefense.com	2012

## Memberships & Affiliations

- Member in good standing of the Pennsylvania and New Jersey Bar
- UJA Federation of NY (Leadership Board, Young Lawyers Division, Emerging Leaders and Philanthropists)
- American Bar Association
- UJA of Greater Metrowest, Community Relations Council, Holocaust Memorial Committee